

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

APPVION, INC. RETIREMENT SAVINGS)
AND EMPLOYEE STOCK OWNERSHIP)
PLAN, BY AND THROUGH GRANT LYON)
IN HIS CAPACITY AS THE ESOP)
ADMINISTRATIVE COMMITTEE OF)
APPVION, INC.,)

Plaintiff,

v.

DOUGLAS P. BUTH, *et al.*,)

Defendants.)

Case No.: 1:18-cv-01861-WCG

**ARGENT TRUST COMPANY'S MEMORANDUM IN RESPONSE TO PLAINTIFF'S
MOTION FOR ENTRY OF FINAL JUDGMENT**

Argent Trust Company (“Argent”) submits this brief response to Plaintiff’s Motion for Entry of Final Judgment Pursuant to Fed. R. Civ. P. 54(b) (Doc. 267) (the “Motion”). Argent takes no position on whether the Court should grant the Motion. Argent does however notify the Court and the parties that if the Court grants the Motion, Argent will move to stay the claims not subject to the Motion. Argent reserves its rights in that regard and is available at the Court’s convenience should the Court wish to discuss this issue or related case management considerations.

Dated: October 20, 2022

By: /s/ William P. McKinley

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Counsel for Argent Trust Company

CERTIFICATE OF SERVICE

I certify that on October 20, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Michael L. Scheier
